

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3 TENKASI VISWANATHAN)

4 Appellant (Pro Se),)

5 vs.)

6 BOARD OF TRUSTEES OF THE CLARK
7 COUNTY SCHOOL DISTRICT;
8 DR. EDWARD GOLDMAN IN HIS
9 OFFICIAL AND INDIVIDUAL CAPACITY;
10 AND LOUIS MARKOUZIS IN HIS
11 OFFICIAL AND INDIVIDUAL CAPACITY,)

12 Respondents.)

Electronically Filed
Dec 30 2021 02:49 p.m.
Supreme Court Case No. 83836
District Court Case No. 20-814819-C
Elizabeth A. Brown
Clerk of Supreme Court

13 **RESPONDENT DR. EDWARD GOLDMAN'S NRAP 14(f) RESPONSE**
14 **TO APPELLANT'S DOCKETING STATEMENT**

15 Respondent DR. EDWARD GOLDMAN, by and through his attorneys JAMES R.
16 OLSON, ESQ. and STEPHANIE A. BARKER, ESQ. of the law firm OLSON CANNON
17 GORMLEY & STOBERSKI, in accordance with NRAP 14(f), hereby submits his response
18 to Appellant's Docketing Statement filed in Nevada Supreme Court Case No. 83836, on
19 December 23, 2021.

20 RESPECTFULLY SUBMITTED this 30th day of December, 2021.

21 OLSON CANNON GORMLEY & STOBERSKI

22 By: /s/ Stephanie A. Barker

23 STEPHANIE A. BARKER, ESQ.

24 State Bar No. 3176

25 9950 W. Cheyenne Ave.

26 Las Vegas, Nevada 89129

27 Phone: (702) 384-4012

28 sbarker@ocgas.com

Attorney for Respondent Dr. Edward Goldman

Respondent DR. EDWARD GOLDMAN disagrees with Appellant's Docketing Statement assertions as follows:

Item 7 – Pending and prior proceedings in other courts:

Appellant notices appeal of dispositive orders in Eighth Judicial District Court (EJDC) Case No. 83836, Appellant's/Plaintiff's Motion Under NRCP Rule 52 and Rule 59 (EJDC Doc ID # 137) remains pending in the underlying EJDC Case and seeks, in primary part, review of the District Court's Order granting summary judgment to Respondent/Defendant Board of Trustees of the Clark County School District (BOT).

Item 8 – Nature of the action:

Appellant makes mis-statements of the record and of the legal basis for the District Court's Orders challenged on appeal, Respondent notes the inaccuracies without correction herein, as inappropriate for the purpose of the Docketing Statement. Instead, Appellant reserves correction of the record for briefing and argument pursuant to NRAP 28, 32, and 34.

Item 9 – Issues on Appeal:

Whether the District Court erred in granting case dispositive motions.

Item 17 – Assignment to the Court of Appeals or retention in the Supreme Court:

This matter is neither presumptively retained by the Supreme Court nor presumptively assigned to the Court of Appeals under NRAP 17.

Item 18 – Tolling of the Time for Notice of Appeal (NRCP 50(b), 52(b), or 59):

- Appellant's NRCP Rule 52 and Rule 59 Motion pending in the Eighth Judicial District Court (EJDC Doc ID # 137) challenges solely the District Court's Order granting summary judgment in favor of Respondent/Defendant BOT (EJDC Doc ID # 132), and tolls the time to appeal that Order. In that regard this appeal is premature.
- Appellant's NRCP Rule 52 and Rule 59 Motion pending in the Eighth Judicial District Court (EJDC Doc ID # 137) does *NOT* challenge the District Court's Order granting summary judgment in favor of Respondent/Defendant Dr. Edward Goldman (EJDC Doc ID # 131).

RESPECTFULLY SUBMITTED this 30th day of December, 2021.

OLSON CANNON GORMLEY & STOBERSKI

By: /s/ Stephanie A. Barker

STEPHANIE A. BARKER, ESQ.

State Bar No. 3176

9950 W. Cheyenne Ave.

Las Vegas, Nevada 89129

Phone: (702) 384-4012

sbarker@ocgas.com

Attorney for Respondent Dr. Edward Goldman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of December, 2021, I served the above and foregoing RESPONDENT DR. EDWARD GOLDMAN'S NRAP 14(f) RESPONSE TO APPELLANT'S DOCKETING STATEMENT RE: Case No. 83836, via U.S. Mail and via electronic means to the below registered users of the court's electronic filing system consistent with NEFCR 9, and NRAP 25(c)(1)(B) and (E), on the following parties at the following addresses:

CRYSTAL J. HERRERA, ESQ.
Office of the General Counsel
Clark County School District
5100 W. Sahara Ave.
Las Vegas, NV 89146
Herrec4@nv.ccsd.net

*Attorney for Respondent Board of
Trustees and Markouzis*

TENKASI VISWANATHAN
8220 Hollister Ave.
Las Vegas, NV 89131-4530
Viswanathan.tenkasi@gmail.com
Appellant, Pro Se



Employee of Olson Cannon Gormley & Stoberski